

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

- v. -

LAWRENCE RAY,

Defendant.

No. 20 Cr. 110 (LJL)

**AFFIDAVIT OF ALLEGRA GLASHAUSSER  
PURSUANT TO LOCAL CRIMINAL RULE 16.1**

I, Allegra Glashausser, hereby certify that:

1. I am an attorney at Federal Defenders of New York, Inc., counsel for defendant Lawrence Ray in the above-captioned matter.
2. This affidavit is submitted in connection with Mr. Ray's Motion To Exclude the Government's Proffered Expert Witnesses.
3. Pursuant to Local Criminal Rule 16.1, co-counsel and I met and conferred with counsel for the government by email between December 2, 2021 and December 6, 2021 regarding the government's expert disclosures, as reflected in Exhibit B to the instant motion. Specifically, the defense requested that the government provide:
  - a. Additional information concerning Stephen Flatley's expected testimony;
  - b. The studies, data, and literature that Dawn Hughes will base her opinions on, as referenced in the government's November 15 disclosure;
  - c. Additional information concerning Andrew Petersohn's opinions and the basis of his opinions, including a request for additional information concerning the VoLTE technical issue; and

- d. A copy of the files of medical documents that Dr. Richard Pleus reviewed in connection with this case.
4. With respect to Mr. Flatley, the government provided additional information and reiterated its intent to call Mr. Flatley as a lay witness.
5. With respect to Dr. Hughes, the defense has not yet received the requested information.
6. With respect to Mr. Petersohn, the government clarified that he is expected to testify that in 2018 and 2019, the devices assigned certain phone numbers most frequently accessed cell sites near Piscataway, NJ, and that he will testify the devices were near each other during a particular time period. The government stated that Mr. Petersohn is preparing maps that the government intends to use as exhibits, which it expects to disclose on December 15, 2021. The defense's understanding is that these maps will reflect Mr. Petersohn's actual opinion and analysis of the historical cell site data reflected in Appendix B. The Government did not provide additional information concerning the VoLTE technical issue.
7. With respect to Dr. Pleus, the government made available to the defense copies of the medical documents Dr. Pleus reviewed in connection with this case.

I certify that the foregoing statements are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

Dated: December 6, 2021  
New York, New York

/s/  
Allegra Glashausser  
*Counsel for Lawrence Ray*